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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SS&C Technologies, Inc.,

Plaintiff,

-against-

REUTERS AMERICA LLC, REUTERS LIMITED, and REUTERS AMERICA, INC.,

Defendants.

06 Civ. 00154 (NRB)
ECF Case

JOINT PROPOSED DISCOVERY PLAN PURSUANT TO RULE 26(f)

Pursuant to Rule 26(f) of the Federal Rules of Civil Procedure, Defendants-Counterclaim-Plaintiffs Reuters America LLC and Reuters Limited, (collectively "Reuters" or "Defendants-Counterclaim-Plaintiffs"), by and through its attorneys, Lankler Siffert & Wohl LLP, and Plaintiff-Counterclaim-Defendant SS&C Technologies, Inc. ("SS&C" or "Plaintiff-Counterclaim-Defendant"), by and through its attorneys, Edwards Angell Palmer & Dodge LLP, hereby submit the following joint statement.

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I. Obligation of Counsel to Confer

As required by Rule 26(f) of the Federal Rules of Civil Procedure, the attorneys for the parties met on March 13, 2006.

The following proposed schedule is a product of that conference.

II. Initial Disclosures

Counsel for Reuters and SS&C (the "Parties") discussed, agreed to, and propose the following plan for initial disclosures.

The parties shall exchange initial disclosures no later than April 14, 2006. The initial disclosures will include the identification of individuals likely to have discoverable information that the disclosing party may use to support its claims and defenses and the subjects of the information. The Parties have agreed that disclosures of documents and other information will be governed by the discovery schedule proposed below.

III. Proposed Discovery Schedule

The Parties discussed, agreed to, and propose the following discovery plan.

(1) All discovery, subject to the provisions herein, will be commenced in time to be completed by August 28, 2006.

(2) The Parties shall serve their first requests for production of documents and first set of third-party document requests no later than May 15, 2006. Responses to document requests shall be due within 30 days unless the Parties otherwise stipulate or the Court otherwise orders.

(3) The Parties shall complete document discovery by June 15, 2006, subject to any follow-up requests.

(4) The Parties shall commence fact depositions on May 30, 2006 or later. The Parties shall complete depositions of fact witnesses by July 28, 2006.

(5) The Parties shall serve requests for admission no later than June 28, 2006. Responses to requests for admission shall be due within 30 days unless the Parties otherwise stipulate or the Court otherwise orders.

IV. Experts

The Parties discussed, agreed to, and propose the following plan for expert discovery. In the event that either Party expects to rely upon an expert report, said expert report shall be served no later than July 28, 2006. In the event that either Party wishes to file an expert rebuttal report or conduct expert discovery, said report shall be submitted by or discovery shall be completed by August 28, 2006.

V. **Motions**

The Parties discussed, agreed to, and propose the following schedule for the submission of motions.

All motions to compel fact discovery shall be served by July 27, 2006. The Court may extend the discovery period beyond July 28, 2006 if necessary to permit the Parties to comply with the Court's disposition of any such motion.

All potentially dispositive motions shall be served no later than August 28, 2006.

VI. **Joint Pretrial Order**

The Parties discussed, agreed to, and propose the following plan for filing a joint pretrial order.

The Parties shall file a joint pretrial order on September 18, 2006, or, if a dispositive motion is filed, 30 days after the Court decides the dispositive motion. If the Court grants the dispositive motion in such a manner that renders trial unnecessary, the Parties shall not file a joint pretrial order.

VII. **Settlement**

The Parties have discussed the possibility of settlement and anticipate continuing to have good faith settlement discussions. The Parties propose a settlement conference before a magistrate judge.

Dated: New York, New York
March 24, 2006

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So Ordered:
this 3d day of April, 2006

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Hon. Naomi Reice Buchwald
United States District Judge